

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

THE APPLICATION OF COLUMBIA GAS OF )  
KENTUCKY, INC. TO IMPLEMENT A NEW )  
SMALL VOLUME GAS TRANSPORTATION )  
SERVICE, A GAS PRICE HEDGING PLAN, )  
AN OFF-SYSTEM SALES AND CAPACITY )  
RELEASE REVENUE SHARING MECHANISM, )  
AND A GAS COST INCENTIVE MECHANISM )

CASE NO. 2004-00462

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**MOTION FOR FULL INTERVENTION BY  
COMMUNITY ACTION COUNCIL FOR LEXINGTON-FAYETTE,  
BOURBON, HARRISON AND NICHOLAS COUNTIES, INC.**

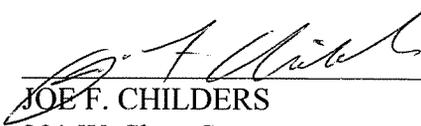
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Come now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), by counsel, pursuant to 807 KAR 5:001 Section 3(8), and hereby moves for leave to intervene as a full party in the above-referenced proceeding. In support of this motion, CAC states as follows:

1. CAC is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents of Columbia Gas's service territory, including Columbia's current Customer Assistance Program (CAP). In addition, CAC formerly operated a program providing Columbia Gas CHOICE customers, particularly low-income customers, with an alternative gas supplier, a program that is no longer operating. As such, it is likely to present issues and provide a perspective which is not likely to be presented by the other parties to this proceeding, and its interests are not adequately represented by other parties to this proceeding. CAC's

participation will not unduly delay these proceedings, and CAC is not requesting amendment of the current procedural schedule.

2. In this proceeding, the Commission will examine several proposals offered by Columbia, including a CHOICE program, which may have a significant impact on the low-income customers of Columbia.
3. CAC expects to present testimony from Jack E. Burch, Executive Director. CAC may choose to present testimony from other witnesses not yet identified.
4. CAC respectfully requests that it be granted leave for full intervention and to participate fully as a party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross examine witnesses, present argument and file briefs as allowed by the Commission.



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**ATTORNEY FOR COMMUNITY  
ACTION COUNCIL FOR  
LEXINGTON-FAYETTE, BOURBON,  
HARRISON AND NICHOLAS  
COUNTIES, INC.**

### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document has been served on the following persons by mailing the same on this the 14<sup>th</sup> day of January, 2005:

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